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10 *Attorneys for Plaintiff, HSBC Bank USA, National Association, as Trustee in Trust for the*
11 *Registered Holders of ACE Securities Corp. Home Equity Loan Trust, Series 2006-NC2, Asset*
12 *Backed Pass-Through Certificates*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 HSBC BANK USA, NATIONAL
16 ASSOCIATION, AS TRUSTEE, IN TRUST
17 FOR THE REGISTERED HOLDERS OF
18 ACE SECURITIES CORP. HOME EQUITY
19 LOAN TRUST, SERIES 2006-NC2, ASSET
20 BACKED PASS-THROUGH
21 CERTIFICATES,

22 Plaintiff,

23 vs.

24 FIDELITY NATIONAL TITLE GROUP,
25 INC.; CHICAGO TITLE INSURANCE
26 COMPANY; TICOR TITLE OF NEVADA,
27 INC.; DOE INDIVIDUALS I through X; and
28 ROE CORPORATIONS XI through XX,
inclusive,

Defendants.

Case No.: 2:21-cv-01300-APG-NJK

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO
RESPOND TO CHICAGO TITLE
INSURANCE COMPANY'S
OPPOSITION TO MOTION FOR
PARTIAL SUMMARY JUDGMENT
[ECF No. 48]**

[First Request]

Plaintiff, HSBC Bank USA, National Association, as Trustee in Trust for the Registered
Holders of ACE Securities Corp. Home Equity Loan Trust, Series 2006-NC2, Asset Backed Pass-
Through Certificates ("HSBC Bank") and Defendant Chicago Title Insurance Company
("Chicago Title"), by and through their counsel of record, hereby stipulate and agree as follows:

1. On July 8, 2021, HSBC Bank filed its Complaint in Eighth Judicial District Court,
Case No. A-21-837574 -C [ECF No. 1-1];

2. On July 8, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No. 1];
3. On September 10, 2021, Chicago Title filed a Motion to Dismiss [ECF No. 19];
4. On November 19, 2021, HSBC Bank filed an Opposition to Chicago Title's Motion to Dismiss [ECF No. 39] and a Countermotion for Partial Summary Judgment [ECF No. 40];
5. On January 10, 2022, Chicago Title filed its Reply in Support of its Motion to Dismiss and an Opposition to HSBC Bank's Countermotion for Partial Summary Judgment [ECF No. 48] ("Opposition").
6. HSBC Bank's deadline to respond to Chicago Title's Opposition is January 24, 2022.
7. HSBC Bank's counsel is requesting a brief two-week extension until February 7, 2022, to file its response to the pending Opposition;
8. This extension is requested to allow counsel for HSBC Bank additional time to review and respond to the points and authorities cited to in the pending Opposition;
9. Counsel for Chicago Title does not oppose the requested extension;

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